

September 1, 2025

Board of Ethics & Campaign Practices City Clerk's Office City of Albuquerque 600 2nd St. NW Albuquerque, NM 87102

RE: BOE 03-2025 Telles v. Forrester

Dear Board Members:

I hope this letter finds you well. These are the potential witnesses, possible testimony and documents that may be used by the Respondent on September 10, 2025.

STATEMENT:

I am in receipt of Ms. Ross's statement letter dated September 1, 2025. Ms. Telles does not get an umpteenth bite at the apple. If the Board does not articulate in the first 5 minutes of the hearing what exactly the factual allegations are against Mr. Forrester that gives rise to a specific, chapter and verse violation of the Ethics code, then this prosecution cannot proceed.

A complaint shall be considered facially sufficient if the complaint contains the following: A description, in reasonable detail of the alleged violation, including the section(s) or part(s) of the Codes or Rules of the Board that Complainant believes in good faith to have been violated;" [5(A)(3)(g)] of the Rules of the Board of Ethics

Let's try this again. Ms. Ross claims Mr. Forrester violated;

• Open and Ethical Elections Code, Part 6 (Coordinated Expenditures); There was no expenditure. Pain and simple. I don't know why the petitioner continues down

this path. Please stop. Anyone who suggests there was an expenditure has lost their marbles.

- Rules of the Board of Ethics and Campaign Practices, Sec. 5(A)(3)(g); Ms. Ross cannot say, "These citations satisfy the requirement of Section 5(A)(3)(g) that a complaint include the sections or parts of the Codes or Rules Complainant believes in good faith were violated." and then not cite any specific section(s) or part(s) of the Code or Rules.
- City Charter Articles XIII & XVI governing ethical conduct in elections. These are articles. The ordinance requires "sections" or "parts" to be cited. You can't just cite an entire article and think that that is ok. "Your honor, the state charges the defendant under Article 30 of the Criminal Code." See how ridiculous that is? The prosecution is not allowed to do that.

Mr. Forrester reached out to Ms. Telles as a friend and offered to assist her in maneuvering a very precarious political predicament: Not getting enough valid signatures during the time allotted by law to become a candidate for Albuquerque City Council, District 1. A political predicament that has since gotten more brazen, is now more public and has become unprecedentedly bizarre.

WITNESS LIST:

The following may be called to testify at the September 10th hearing.

- Stephanie Telles
- Scott Forrester
- Anyone who may have advised Ms. Telles similarly as Mr. Forrester is alleged.
- Anyone what may have advised Ms. Telles to obtain and file additional petition signatures beyond the July 7, 2025 deadline contrary to law. [CABQ Ordinance § 2-4-10(2).]
- Anyone who may have advised Ms. Telles to submit a declaration of candidacy contrary to city ordinance. "All candidates who submitted a petition in accordance with Section 4, Article II of the City Charter shall file the results of the City Clerk's petition signature verification and their Declaration of Candidacy" [City Election Code § 2-4-10(G)] emphasis added
- Anyone who may have advised Ms. Telles to submit a declaration of candidacy that included illegally obtained petition signatures contrary to state law. "Whoever knowingly makes a false statement in a declaration of candidacy is guilty of a fourth

degree felony and shall be sentenced pursuant to the provisions of Section 31-18-15 NMSA 1978." [§ 1-22-7 NMSA 1978]

- Anyone on Ms. Telles's witness list.
- Anyone who may testify in this matter.

WITNESS TESTIMONY:

If testifying, Mr Forrester would testify that he was not employed not speaking on behalf of the Griego campaign on July 11, 2025; that he reached out to the Telles campaign and eventually Ms Telles as a friend, sharing his vast knowledge and campaigning experience to give Ms. Telles a "heads up' about the reality of her situation and to encourage her to take a wiser course of action with regards to her failed candidacy.

DOCUMENTS / EVIDENCE:

- any and all documents submitted by Ms. Telles to any government agency regarding Mr. Forrester.
- any and all documents from the CABQ in this matter.
- Ms. Telles's declaration of candidacy which contains petition signatures obtained and submitted after the July 7, 2025 deadline, contrary to law; [see page 51]

Thank you.	
Sincerely,	
<u>/S/</u>	
Antonio Maestas	
Attorney at Law	

cc: CABQ Clerk
CABQ City Attorney
Board Chair
Counsel for Complainant